

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jennifer Schaadt,

Plaintiff,

v.

**Affidavit of Beth Bertelson In Support
Of Plaintiff's Objections and Request for
Review of the Magistrate Judge's Order Dated
April 4, 2006**
Civil No. 05-CV-01167 (RHK/JSM)

St. Jude Medical, S.C., Inc.

Defendant.

Beth Bertelson, being first duly sworn upon oath, deposes and states as follows:

1. That I am an attorney licensed to practice law in the State of Minnesota. I am an attorney who represents Plaintiff in the above-entitled matter.
2. That the documents attached hereto as Exhibits are true and correct copies of documents. The following exhibits are attached:

Exhibit 1 - Blake v. U.S. Bank National Association, Civ. No. 03-6084 (PAM/RLE).

Exhibit 2 - Excerpts from the deposition of Jennifer Schaadt.

Exhibit 3 - Magistrate Judge Mayeron's Order dated April 4, 2006.

- Exhibit 4 – Plaintiff answer to Interrogatory No. 6 of Defendant's Interrogatories to Plaintiff.
 - Exhibit 5 – Plaintiff's answer to Interrogatory No. 4 of Defendant's Interrogatories to Plaintiff.
 - Exhibit 6 - Plaintiff's Consultant job description at her present employer.
 - Exhibit 7 - Plaintiff's Senior Consultant job description at her present employer.
 - Exhibit 8 - Rule 26(f) Report filed August 8, 2005.
3. In my experience, after practicing employment law for 16 years, the expert witnesses called to testify at trial by a defendant do not solely testify regarding the plaintiff's claim for emotional distress damages. Rather, they often testify as to veracity and as to plaintiff's underlying claims.

FURTHER YOUR AFFIANT SAYETH NAUGHT.

s/ Beth Bertelson

Subscribed and sworn to before me
this 13th day of April, 2006

s/ Andrea Gesellchen
Notary Public